

**AMERICAN  
ATHEISTS**

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**American Atheists, et al v. Rapert; Responses to Plaintiffs' discovery requests**

1 message

**Geoffrey T. Blackwell** <gblackwell@atheists.org>

Tue, Aug 31, 2021 at 1:21 PM

To: "William C. Bird III" &lt;william.bird@arkansasag.gov&gt;, Paul Byrd &lt;paul@paulbyrdlawfirm.com&gt;

Cc: Abtin Mehdizadegan &lt;abtin@cgwg.com&gt;, Bryan Borland &lt;bborland@cgwg.com&gt;

Good afternoon, gentlemen.

Last Tuesday, I clarified Request for Production No. 6 from Plaintiffs' first set of discovery requests to Defendant in his official capacity and that Request for Production No. 4 seeks a complete copy of the identified social media accounts. We received no substantive response or production from you after that date.

Plaintiffs' requests were first served on the Defendant on March 5, 2021, and we are well past the date on which a complete response was required. If, by Friday, September 3rd, the Plaintiffs have not received a supplemental response from the Defendant addressing the deficiencies discussed in my letter dated June 8, 2021, and our conference call on August 11, 2021, the Plaintiffs will have no choice but to file a motion to compel.

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**Geoffrey T. Blackwell, Esq.**

(he/him/his)

Litigation Counsel

American Atheists Legal Center

American Atheists, Inc.

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